

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,
v.

JAMES G. WILSON,
[DOB: 08-12-1989],

Defendant.

No. 20-5012-01-CR-SW-MDH

COUNT 1
21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1,000,000 Fine
NLT 3 Years Supervised Release
Class C Felony

COUNT 2
18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment Mandatory
NMT Life Imprisonment
Consecutive Sentence to All Counts
NMT \$250,000 Fine
NMT 5 Years Supervised Release
Class A Felony

COUNT 3
18 U.S.C. §§ 922(g)(1) and 924(a)(2)
NMT 10 years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

ALLEGATION OF FORFEITURE

\$100 Mandatory Special Assessment Each
Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

On or about July 24, 2019, in Jasper and Newton Counties, in the Western District of Missouri, the defendant, **JAMES G. WILSON**, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a

Schedule II controlled substance. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 2

On or about July 24, 2019, in Jasper and Newton Counties, in the Western District of Missouri, the defendant, **JAMES G. WILSON**, knowingly possessed a firearm, that is a Hi-Point brand, CF380 model, .380-caliber pistol, bearing serial number P8082955, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession, with intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1. All in violation of Title 18, United States Code Section 924(c)(1)(A).

COUNT 3

On or about July 24, 2019, in Jasper and Newton Counties, in the Western District of Missouri, the defendant, **JAMES G. WILSON**, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a Hi-Point brand, CF380 model, .380-caliber pistol, bearing serial number P8082955; and the firearm was in and affecting interstate commerce. All in violation of Title 18, United States Code Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts 2 and 3 of this Indictment are re-alleged and incorporated by reference as though set forth fully here in for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d); Title 26, United States Code, Section 5872; Title 49, United States Code, Section 80303; and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses set forth in Counts 2 and 3 of this Indictment, the defendant shall forfeit to the United States any firearms and ammunition involved or used in the commission of the offenses, including, but not limited to, a Hi-Point brand, CF380 model, .380-caliber pistol, bearing serial number P8082955.

All pursuant to 18 U.S.C. § 924(d); 26 U.S.C. § 5872; 49 U.S.C. § 80303; and 28 U.S.C. § 2461(c).

A TRUE BILL.

/s/ Kevin Elliott
FOREPERSON OF THE GRAND JURY

/s/ Anthony Brown
ANTHONY M. BROWN
Special Assistant United States Attorney
MO Bar #62504

Dated: 06/09/2020
Springfield, Missouri